



UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

DEONIS JELKS
Defendant

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NO. 3:11-00012
Senior Judge Wiseman

SUPPLEMENT TO
PETITION TO ENTER A PLEA OF GUILTY
AND
MOTION TO BE SENTENCED AT PLEA HEARING

The defendant, Deonis Jelks, by and through counsel of record, Deonis Jelks, submits this pleading to supplement the Plea Petition filed in this matter, and respectfully moves this Court to sentence the defendant at the time the guilty plea is entered in this matter. In support of the this motion the defendant would show the following:

The plea in this matter is entered pursuant to *Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure*, and a Plea Agreement where the agreed sentence is 150 months.

The defendant has an 11th grade education and attended a regular curriculum at Clarksville High School.

The defendant was raised by his mother, Rosalyn Jelks, and lived in Clarksville, TN. The defendant has one sibling, his sister Alaye Jelks, 15 years old. The family lived in Section 8 Housing, received social assistance in the form of Food Stamps, they were poor but always had food to eat. The defendant did not see or suffer from abuse. The

defendant never knew his father. The only adult male in the defendant's life was an uncle, Richard Jelks, who passed away when the defendant was 17 years old.

The defendant has one child, Devion Trice, age 4 who lives with his mother, Kei Trice age 22. The defendant has been involved in a relationship with Ms. Trice for 7 to 8 years. The child, Devion, has a medical condition which affects the child's blood requiring the child to be treated at Vanderbilt Children's Hospital once every 2 to 3 months and requiring daily medication. The defendant was involved in day to day life of his son, providing daily care.

The defendant has no physical or mental health issues, has never been hospitalized, and does not take prescription medication.

The defendant last worked at Electrolux, but quit the job before he was arrested in this matter. Prior to working at Electrolux, the defendant worked at Sonic, Taco Bell, Randstad Staffing, but the specific dates of employment are unknown.

The defendant has one prior criminal conviction for Simple Possession of Marijuana, he was sentenced on 2/28/2007, and was placed on probation. The defendant's probation was violated, and he was ordered to serve the balance of his sentence on 6/25/2008.

The defendant used Marijuana starting when he was 17 years old, and continued its use, smoking at least every other day until his arrest in this case. The defendant did not use any other controlled substances.

The defendant was determined to be indigent, and counsel was appointed pursuant to the *Criminal Justice Act, 18 U.S.A. 3006A*.

The defendant moves this Honorable Court to sentence the defendant at the time the guilty plea is entered in this matter.

Signed by me in open court under the penalties of perjury in the presence of my lawyer,
this the 10 day of Sept, 2012.

Deonis Jelks
DEONIS JELKS

Respectfully submitted,

Haymaker & Heroux, P.C.

S:/ David R. Heroux
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